

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION  
September 2009 Grand Jury

**SACR 10-0028**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
JANE DOE,  
a/k/a "Michelle L.  
Anunciacion,"  
Defendant.

Case No. SA CR 10-

I N D I C T M E N T

[18 U.S.C. § 1424: False  
Personation In Naturalization  
Proceeding; 18 U.S.C. § 1425:  
Procurement Of Naturalization  
Unlawfully; 18 U.S.C. § 1524:  
False Statement In Passport  
Application; 42 U.S.C.  
§ 408(a)(6): Furnishing False  
Information To Social Security  
Administration]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1424]

On or about February 23, 2000, in Orange County and  
elsewhere within the Central District of California, defendant  
JANE DOE, also known as "Michelle L. Anunciacion," an applicant  
in a naturalization and citizenship proceeding, knowingly

1 personated another and appeared falsely in an assumed and  
2 fictitious name, specifically, the name of "Michelle Augustin  
3 Llacuna," in connection with a naturalization ceremony and other  
4 proceedings on defendant's application to become a naturalized  
5 United States citizen.

COUNT TWO

[18 U.S.C. § 1425]

On or about February 23, 2000, in Orange County, and elsewhere within the Central District of California, defendant JANE DOE, also known as "Michelle L. Anunciacion," knowingly procured for herself, contrary to law, naturalization as a United States citizen and documentary and other evidence of such naturalization, to which she was not entitled.

Specifically, defendant knowingly procured naturalization for herself, contrary to law, by making material false statements in connection with her application for naturalization, including statements (a) that her name was "Michelle Augustin Llacuna"; (b) that certain information accurately specified the names of her parents, her date of birth, and her place of birth; and (c) that defendant had never given false testimony for the purpose of obtaining an immigration benefit. In truth, as defendant then well knew, (a) "Michelle Augustin Llacuna" was not her true name; (b) the information regarding the names of defendant's parents, defendant's date of birth, and defendant's place of birth were all untrue; and (c) defendant had given false testimony to obtain an immigration benefit to which she was not entitled, including false sworn statements regarding her name and other identifying information in support of her application for an immigrant visa and alien registration (by which she fraudulently obtained admission into the United States and issuance of a permanent resident alien card), and her application for naturalization and related proceedings. Defendant also procured her naturalization as a United States citizen contrary

1 to law, and to which she was not entitled, because she had  
2 obtained her permanent residency status by fraud.

COUNT THREE

[18 U.S.C. § 1542]

On or about January 5, 2001, in Orange County, within the Central District of California, defendant JANE DOE, also known as "Michelle L. Anunciacion," willfully and knowingly made a false statement in an application for a United States passport, with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that, in such application, defendant stated that her name was "Michelle Augustin Llacuna" and provided other information regarding the names of her parents, her date of birth, and her place of birth, whereas, in truth and fact, as defendant then knew, her name was not "Michelle Augustin Llacuna" and her other identifying information was also false.

COUNT FOUR

[42 U.S.C. § 408(a)(6)]

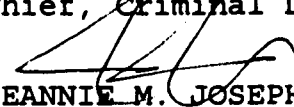
On or about July 20, 2007, in Orange County, within the Central District of California, defendant JANE DOE, also known as "Michelle L. Anunciacion," with intent to deceive the Commissioner of Social Security as to her true identity, knowingly and willfully furnished and caused to be furnished false information to the Commissioner of Social Security with respect to information required by the Commissioner of Social Security in connection with the establishment and maintenance of the records provided for in Title 42, United States Code, Section 405(c)(2), in that, in an application for a replacement Social Security Card, defendant knowingly and willfully made false statements as to her name, the names of her parents, her date of birth, and her place of birth.

A TRUE BILL

/s/  
Foreperson

GEORGE S. CARDONA  
Acting United States Attorney

CHRISTINE C. EWELL  
Assistant United States Attorney  
Chief, Criminal Division

  
JEANNIE M. JOSEPH  
Assistant United States Attorney  
Acting Chief, Santa Ana Branch Office

ROBERT J. KEENAN  
Assistant United States Attorney